

## REMARKS

Reconsideration of the above-referenced application in view of the following remarks is respectfully requested.

Claims 1-20 are pending in this application. Applicant affirms the election of Claims 1-13 and acknowledges the withdrawal of Claims 14-20 from consideration.

Claims 1-3, 6-9, 12, and 13 stand rejected under 35 U.S.C. 102(b) as being anticipated by Drussel, et al. (U.S. Patent No. 6,047,470). Applicant respectfully traverses the rejection. Claims 1 and 8 pertain to methods of cutting integrated circuit packages that include steps of providing an integrated circuit package as well as cutting an integrated circuit package. In contrast, Drussel discloses a method of forming openings in a circuit board substrate *prior* to processing steps such as soldering, encapsulating, etc. (col. 8, lines 44-60) used to form integrated circuit packages on the circuit board substrate. Drussel considers forming openings 24 prior to forming the integrated circuit packages an advantage since doing so "reduces the amount of routing necessary to singulate after circuit portions have been formed" (col. 8, lines 57-58). Therefore, Drussel not only does not disclose the claimed inventions, but in fact teaches away from those inventions. With regard to Drussel's definition of "circuit board substrate assembly" set forth in column 4, which includes "a circuit board substrate material having encapsulated circuitry defined in various regions of the substrate material", note that Drussel does not teach or suggest cutting the encapsulated circuitry. Note further that Drussel's teachings in column 8 contradict an interpretation of the teachings in column 4 that Drussel's openings 24 are formed after encapsulated circuitry is formed on his circuit board substrate. Therefore, Applicant respectfully submits that Claims 1 and 8 are patentable over Drussel. Claims 2, 3, 6, 7, 9, 12, and 13 depend from Claims 1 and 8 and are therefore

patentable over Drussel at least by virtue of their dependence from a patentable base claim.

Claims 4 and 10 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Drussel in view of Hashish, et al. (U.S. Patent No. 4,648,215). Claims 4 and 10 depend from Claims 1 and 8, respectively. As argued above, Drussel does not disclose the features of Claims 1 and 8, and in fact teaches away from the inventions described in those claims. Hashish, cited for its teaching of a high velocity liquid abrasive jet, does not cure the deficiencies of Drussel with respect to Claims 1 and 8. Therefore, Applicant respectfully submits that Claims 4 and 10 are patentable over Drussel in view of Hashish at least by virtue of their dependence from patentable base claims.

Claims 5 and 11 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Drussel in view of Romanini (U.S. Patent No. 6,305,261). Claims 5 and 11 depend from Claims 1 and 8, respectively. As argued above, Drussel does not disclose the features of Claims 1 and 8, and in fact teaches away from the inventions described in those claims. Romanini, cited for its teaching of cutting with focused jets of high pressure water of 2,000 psi, does not cure the deficiencies of Drussel with respect to Claims 1 and 8. Therefore, Applicant respectfully submits that Claims 5 and 11 are patentable over Drussel in view of Romanini at least by virtue of their dependence from patentable base claims.

Applicant respectfully requests reconsideration and withdrawal of the rejections and allowance of Claims 1-13. If the Examiner has any questions or other correspondence regarding this application, Applicant requests that the Examiner contact Applicant's attorney at the below listed telephone number and address.

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